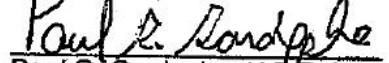


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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: September 28, 2021

September 27, 2021

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Nicole Bell, 21-cr-145 (PGG)


Dear Judge Gardephe:

I write, respectfully, pursuant to the Criminal Justice Act, to request the appointment of associate counsel to assist in the above referenced case. Specifically, I am requesting the appointment of Diane Ferrone, Esq. at an hourly rate of \$110, with approval of 100 hours. Ms. Ferrone has been appointed associate counsel on numerous CJA cases in the Southern District of New York.

The indictment alleges that Ms. Bell participated in a bank fraud conspiracy over one and a half year period. If appointed, Ms. Ferrone would assist with, among other things, reviewing the voluminous discovery that has been produced, meeting with Ms. Bell, researching legal issues, investigating the relevant factual background and defenses, drafting motions, and preparing for Ms. Bell's defense at trial. Ms. Bell is also currently suffering from various health issues that are not being addressed by the MDC, and Ms. Ferrone will help on that front, including obtaining Ms. Bell's prior medical records. There is also the issue of Ms. Bell's open state case in another jurisdiction that will have impact in the instant case. Finally, I note that I am scheduled to be on trial beginning November 15 before Judge Stein for one to two weeks.

I am highly conscious of the importance of preventing the needless expenditure of CJA funds. Consistent with the goals of conserving resources, I believe the appointment of Ms. Ferrone in this case will result in substantial savings by relieving me from performing tasks that would be more expensive due to my higher bill rate.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

David S. Greenfield